

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS	)	
OF NORTHERN ILLINOIS WELFARE AND	)	
PENSION FUNDS,	)	
	)	
Plaintiffs,	)	
	)	No. 2012 C 7193
v.	)	
	)	Judge Castillo
	)	
PRAIRIE STATE TRANSPORTATION AND	)	
LEASING, INC.,	)	
an Illinois corporation,	)	Magistrate Judge Mason
	)	
Defendant.	)	

**MOTION FOR JUDGMENT IN SUM CERTAIN**

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS, by and through their attorneys, JOHN J. TOOMEY, and ARNOLD AND KADJAN, and, pursuant to FRCP 55, move for entry of judgment in sum certain. In support of their Motion, Plaintiffs state as follows:

1. Suit was filed on September 10, 2012 for collection of delinquent ERISA contributions, plus attorneys' fees, costs, and interest, under 29 U.S.C. 1132(g)(2).
2. Service was made upon Prairie State Transportation and Leasing, Inc., an Illinois corporation, on October 2, 2012, and a copy of the proof of service was filed with the court on October 9, 2012.
3. On October 24, 2012 this Court entered an Order of Default against the Defendant for failure to timely appear, answer or otherwise plead to Plaintiffs' Complaint.

4. As supported by the attached Affidavits, the sums due on the Complaint are:

\$886.99 Pension audit  
\$2,093.80 Welfare audit  
\$925.00 Attorneys fees  
\$432.00 Court costs  
\$4,337.79

WHEREFORE, Plaintiffs pray for the entry of an Judgment Order in favor of the Plaintiffs Trustees of the Suburban Teamsters of Northern Illinois Welfare and Pension Funds as follows:

WHEREFORE, Plaintiffs pray for the entry of an order:

- A. Awarding judgment in favor of Plaintiffs, TRUSTEES OF THE  
SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE  
AND PENSION FUNDS in the amount of \$4,337.79.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS WELFARE AND  
PENSION FUNDS

s/John J. Toomey  
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Dated: October 30, 2012